

FILED**UNITED STATES DISTRICT COURT****JUN 25 2020**

for the

Northern District of Oklahoma

**Mark C. McCartt, Clerk
U.S. DISTRICT COURT**

United States of America

v.

Ronald Alexander Rodriguez-Paz and Eva Juarez

*Defendant(s)*Case No. **20-mj-162-PJC****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 1, 2019 to December 13, 2019 in the county of Tulsa in the
Northern District of Oklahoma, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1589(a)	Trafficking with respect to peonage, slavery, involuntary servitude, and forced labor
18 U.S.C. § 1590(a)	Forced Labor

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

TFO B.J. David, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

6/25/2020

City and state:

Tulsa, OK*Judge's signature*

Paul J. Cleary, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, R.J. David, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), and have been so employed since February 2020. I am currently assigned to the HSI Office of the Resident Agent in Charge in Tulsa, Oklahoma. My duties include investigating criminal violations relating to human trafficking, of both the sexual and labor varieties. I have received training in the investigation of human trafficking. Furthermore, I am a Tulsa Police officer, and am assigned to the Tulsa Police Department ("TPD") Special Investigation Division's Human Trafficking and Vice Unit, and have been a Tulsa Police Officer since 2015. I received a bachelor's degree in Multidisciplinary Studies from the University of Oklahoma in Norman, Oklahoma. I have been trained in the recognition of controlled dangerous substances by the Tulsa Police Academy, as well as informal training received from more experienced narcotic investigators. In December 2018, I completed the one-week Basic Narcotics Investigators School hosted by the United States Drug Enforcement Administration training staff. I am a graduate of the Reid School of Interview and Interrogation. I have received training in Transnational Gang Identification and Interdiction from the Midwest Counterdrug Training Center. Your affiant has been involved in several narcotics investigations which have led to numerous search warrants and arrest. I have also received additional informal training from more experienced investigators, and have participated in numerous investigations and arrests involving controlled dangerous substances, firearms, and prostitution.

2. This Affidavit is made for the limited purpose of establishing probable cause in support of a criminal complaint alleging that Ronald Alexander Rodriguez-Paz and Eva Juarez violated Title 18 U.S.C. §§ 1589(a) and 1590(a). Based on my training and experience, I know that it is a violation of Title 18 U.S.C. § 1589(a) for any person to knowingly provide or obtain the labor or services of a person by any one of, or by any combination of, the following means— (1) by means of force, threats of force, physical restraint, or threats of physical restraint to that person or another person; (2) by means of serious harm or threats of serious harm to that person or another person; (3) by means of the abuse or threatened abuse of law or legal process; or (4) by means of any scheme, plan, or pattern intended to cause the person to believe that, if that person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint. Moreover, based on my training and experience, I know that it is a violation of Title 18 U.S.C. § 1590(a) for any person to knowingly recruit, harbor, transport, provide, or obtain by any means, any person for labor or services in violation of this chapter.

3. The statements contained in this Affidavit are based on my experience and background as a Tulsa Police Officer and Task Force Officer with HSI, and by information provided by other law enforcement agents. Some information in this affidavit also comes from information received from the issuance of administrative summonses and search warrants. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the attached complaint, this affidavit does not set forth each and every fact I have learned during this investigation.

FACTS SUPPORTING PROBABLE CAUSE

4. On January 4, 2020, Lt. B. Wilson and I conducted an interview with minor victim (hereafter "MV") at the Mingo Valley Division of the Tulsa Police Department. MV, who

is 15 years of age, stated that she, who previously was living in Honduras, was given approximately \$5,000.00 to \$6,000.00 by her half-brother, Ronald Alexander Rodriguez-Paz, who is a Tulsa resident, for the purposes of paying a “coyote” (an individual who assists illegal immigrants in entering the United States of America surreptitiously) to illegally smuggle MV into the United States of America. After arriving in the United States in the summer of 2019 and being granted refugee status, the MV was then sponsored by Rodriguez-Paz to come live with him at his residence, located at 12503 E. 15th Pl., in the city and county of Tulsa.

5. MV stated that she arrived in Tulsa in early July of 2019, after which Rodriguez-Paz immediately forced her to become their housekeeper and full-time caretaker of his four minor children, for which he did not compensate MV. MV stated that at no time did Rodriguez-Paz or his wife, Eva Juarez, attempt to enroll MV in any public or private school, nor did they provide any form of home-schooling. MV stated that she continued to act as the housekeeper and sole caretaker for Rodriguez-Paz and Juarez’s four children from July until November of 2019. During this time, MV stated that Rodriguez-Paz was verbally abusive towards her, and physically assaulted her several times, usually out of anger at MV for housework not being done. MV stated that Juarez would also randomly send her messages, both via text message and Facebook Messenger, that were of a threatening nature, including calling MV “una puta perra” (which translates as “a bitch”), and sending her a picture of a semiautomatic pistol sitting on top of the blanket on the bed in the master bedroom. MV stated that Juarez and Rodriguez-Paz both used the Facebook Messenger account. MV stated that she personally saw firearms in the home, including a silver semiautomatic firearm that Rodriguez-Paz would keep in his waistband.

6. MV stated that in November of 2019, Rodriguez-Paz obtained fake identification documents for MV, which listed her as being 19 years of age, after which Rodriguez-Paz and

Juarez sent MV to work in a restaurant called El Gallo Loco (1060 South Mingo Road). MV said that Rodriguez-Paz and Juarez told her that she owed them \$500.00 per month until her debt (the \$5,000.00-6,000.00 given to her to enter the United States of America) was repaid. MV said that she would make approximately \$800.00 per month at the restaurant, and that Rodriguez-Paz and Juarez would take her entire paycheck, saying that the extra \$300.00 on the check was to pay for her food and room and board. MV said that she was never allowed to keep any of the money that she made while working at El Gallo Loco. MV stated that she worked at the restaurant until her brother, Edwin Alvarez-Paz (with whom she originally entered the United States of America), was released from a refugee facility in Texas and came to Tulsa to remove her from Rodriguez-Paz and Juarez's residence on December 13, 2019.

7. After MV left Rodriguez-Paz and Juarez's house, both she and Alvarez-Paz began receiving threatening messages, both via text message and Facebook Messenger, from both Rodriguez-Paz and Juarez, asking for \$10,000.00 total, or \$1,500.00 every two weeks, until their debt to Rodriguez-Paz is repaid.

8. MV stated that while she was living in Rodriguez-Paz and Juarez's residence (July 2019-December 2019), she was not allowed to leave the home without supervision or have any personal freedom of movement, and was not allowed access to her personal identifying documents, medical documents, or immigration documents (which were kept from her by Rodriguez-Paz and Juarez). MV said that Juarez was continually verbally abusive, and at several instances attempted to goad MV into physically fighting her. MV also stated that both Rodriguez-Paz and Juarez regularly smoked and vaped marijuana inside the home, often in the presence of their children and MV. MV also noticed heavy short-term traffic of individuals coming into the home, and stated that she believes Rodriguez-Paz and Juarez sell marijuana

9. MV stated that, due to Rodriguez-Paz previously assaulting her, and Juarez's threatening messages, both via text message and Facebook Messenger, and behavior, she was afraid to notify any police or social workers of her situation, and was afraid that non-compliance with Rodriguez-Paz and Juarez's directives, or any attempt to leave their household, would cause them to physically and verbally abuse her further.

10. MV stated that while she arrived in Tulsa in July of 2019, she estimated that she started talking with Rodriguez-Paz and Juarez about coming to the U.S. from Honduras in January of 2019.


11. Lt. B. Wilson of the TPD Human Trafficking and Vice Unit contacted social worker S. Polanco, who is the Case Management Specialist assigned to MV via BCFS Health and Human Services, who stated that she went to the residence located at 12503 East 15th Place and contacted Rodriguez-Paz after MV had already left with residence with Alvarez-Paz. Polanco stated that she had gone to the house to obtain personal, medical, and immigration records belonging to MV, and said that she was only able to obtain some of the paperwork, and that important personal documents belonging to MV are still in Rodriguez-Paz's possession. Polanco also stated that Rodriguez-Paz and Juarez were both verbally abusive and threatening towards her, leading to Polanco almost calling 911.

12. On January 9, 2020, the TPD Human Trafficking and Vice Unit, along with Special Agents from HSI, conducted a search warrant on the home of Ronald Rodriguez-Pas and Eva Juarez, located at 12503 E. 15th Pl. During the search warrant, several personal identification and immigration documents belonging to MV were located inside the home, having been hidden in closets. Ronald Rodriguez-Paz and Eva Juarez were both arrested on state human trafficking charges.

CONCLUSION

13. That, to the best of my knowledge and belief, all statements made in this affidavit are true and correct. Based on the foregoing facts, I believe probable cause exists for the issuance of arrest warrants for Ronald Alexander Rodriguez-Paz and Eva Juarez for violating Title 18 U.S.C. §§ 1589(a) and 1590(a).

Dated this 25th day of June, 2020.



R. J. David, Task Force Officer
Homeland Security Investigations

Sworn to before me this 25th day of June, 2020.



Paul J. Cleary
United States Magistrate Judge